

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARTHUR MENALDI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff(s),

-against-

OCH-ZIFF CAPITAL MANAGEMENT
GROUP LLC, DANIEL S. OCH, and JOEL
M. FRANK,

Defendants.

Civil Action No. 14 Civ. 3251 (JPO)

**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiffs Ralph Langstadt and Julie Lemond (collectively, “Plaintiffs” or “Class Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable J. Paul Oetken, United States District Judge of the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York, 10007-1312 for entry of an Order: (i) granting preliminary approval of the proposed Settlement; (ii) approving the Settling Parties’ proposed form and method of giving notice to the proposed Settlement Class; and (iii) setting a date for a Settlement Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Class Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and all exhibits attached thereto, Plaintiffs' supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiffs request that the Court enter the proposed Order of Preliminary Approval of Settlement, a copy of which is attached as Exhibit A to the Stipulation filed concurrently herewith.

Dated: October 2, 2018

Respectfully submitted,

By: /s/Sara Fuks

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